

JONATHAN O. PENA, ESQ.  
CA Bar ID No. 278044  
Peña & Bromberg, PLC  
3467 W. Shaw Ave., Ste 100  
Fresno, CA 93711  
Telephone: 559-412-5390  
Fax: 866-282-6709  
info@jonathanpena.com  
Attorney for Plaintiff

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA**

|                         |   |                            |
|-------------------------|---|----------------------------|
| Paeng See,              | ) | Case No. 1:24-cv-01516-GSA |
| Plaintiff,              | ) | STIPULATION AND ORDER FOR  |
|                         | ) | EXTENSION OF TIME          |
| vs.                     | ) |                            |
| Michelle King, ACTING   | ) |                            |
| COMMISSIONER OF SOCIAL  | ) |                            |
| SECURITY <sup>1</sup> , | ) |                            |
|                         | ) |                            |
| Defendant.              | ) |                            |

Pending the Court's approval, IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Plaintiff shall have a 60-day extension of time, from March 13, 2025 to May 12, 2025, for Plaintiff to serve on defendant with PLAINTIFF'S MOTION

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<sup>1</sup> Michelle King became the Acting Commissioner of Social Security on January 23, 2025. Pursuant to Rule 25(d) of the Federal Rules of Civil Procedure, Michelle King should be substituted for Carolyn Colvin as the defendant in this suit. No further action need be taken to continue this suit by reason of the last sentence of section 205(g) of the Social Security Act, 42 U.S.C. § 405(g).

1 FOR SUMMARY JUDGMENT. All other dates in the Court's Scheduling Order  
2 shall be extended accordingly.

3 This is Plaintiff's first request for an extension of time. Plaintiff respectfully  
4 states that the requested extension is necessary due several merit briefs being due  
5 on the same week. For the weeks of March 10, 2025 and March 17, 2025,  
6 Plaintiff's Counsel has fifteen Merit Briefs due. Counsel requires additional time to  
7 brief the issues thoroughly for the Court's consideration. Defendant does not  
8 oppose the requested extension. Counsel apologizes to the Defendant and Court  
9 for any inconvenience this may cause.

10  
11 Respectfully submitted,

12 Dated: March 4, 2025 PENA & BROMBERG, ATTORNEYS AT LAW

13  
14 By: /s/ Jonathan Omar Pena  
15 JONATHAN OMAR PENA  
16 Attorneys for Plaintiff

17  
18 Dated: March 4, 2025 PHILLIP A. TALBERT  
19 United States Attorney  
20 MATHEW W. PILE  
21 Associate General Counsel  
22 Office of Program Litigation  
23 Social Security Administration

24 By: \*/s/ Justin Lane Martin  
25 Justin Lane Martin  
26 Special Assistant United States Attorney  
27 Attorneys for Defendant  
28 (\*As authorized by email on March 4, 2025)

**ORDER**

Pursuant to stipulation,

IT IS SO ORDERED.

Dated: March 5, 2025

/s/ Gary S. Austin  
UNITED STATES MAGISTRATE JUDGE